NATIONAL ORGANIC STANDARDS BOARD Interdisciplinary Taskforce on Processing and Materials Criteria October 28, 1998

REQUEST FOR COMMENT

CRITERIA FOR THE ACCEPTANCE OF MATERIALS USED IN PROCESSING

The National Organic Standards Board (NOSB) Interdisciplinary Taskforce on Processing and Materials Criteria is requesting comment from all interested parties regarding the Criteria for the Acceptance of Materials Used in Processing. Comments should be sent via e-mail to toni_strother@usda.gov or faxed to (202) 205-7808. Comments should be submitted by January 15, 1999.

Background

The NOSB has, in the past, evaluated a number of materials in the development of the National List of Materials for Organic Processing and the subsequent recommendation to the Secretary of Agriculture. Evaluations were conducted by the Technical Advisory Panel (TAP) and were based on the criteria listed in OFPA Section 2119(m)(1-7) and Section 2118(c). While these criteria provided some basis for evaluation, they were most appropriate for evaluation of agricultural production inputs and not specifically developed for evaluation of processing materials. The NOSB, therefore, feels it is pertinent at this time to develop criteria more appropriate to the evaluation of materials for processing. The following criteria were derived by the Taskforce and were based on input from a number of certifiers and other interested parties in the organic industry. The Taskforce welcomes your comments pertaining to the development of criteria more appropriate to processing and will consider them in our recommendations to the Processing Committee and the full board of the NOSB.

*Note: The current NOSB policy and recommendation to USDA is that certain reviewed and approved synthetic materials are acceptable in processed foods labeled as organic foods. If synthetic ingredients are permitted by law, then the following criteria will apply.

CRITERIA

A SYNTHETIC PROCESSING AID OR ADJUVANT may be used if;

- 1. An equivalent substance cannot be produced from a natural source and has no substitutes that are organic ingredients.
- 2. Its manufacture, use and disposal does not contaminate the environment.
- 3. The nutritional quality of the food is maintained and the material itself or its breakdown products do not have any adverse effect on human health.
- 4. It is not a preservative or used only to recreate/improve flavors, colors, textures, or nutritive value lost during processing except in the latter case as required by law.
- 5. It is Generally Recognized as Safe (GRAS) by FDA when used in accordance with Good Manufacturing Practices (GMP), and contains no residues of heavy metals or other contaminants

in excess of (5%) of the tolerances established by FDA.

- 6. It is compatible with the principles of organic handling.
- 7. There is no other way to produce a similar product without its use and it is used in the minimum quantity required to achieve the process.

*Note: The Taskforce considered having as an additional criterion that the substance not be a product of Genetic Engineering. It was decided, however, that such a prohibition should apply to all substances used in the production and processing of organic food and hence would be covered elsewhere in the rules.